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Attorneys for Sentara Healthcare

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

BOBBI POLANCO,
On behalf of herself and all
Others similarly situated

Plaintiff,

v.

OMNICELL, INC.; SOUTH JERSEY
HEALTH SYSTEM, INC.; INSPIRA
HEALTH NETWORK, INC.; SENTARA
HEALTHCARE, INC.; BOARD OF
REGENTS OF THE UNIVERSITY OF
MICHIGAN; DOE'S 1-50; ABC Corporations
1-50; and XYZ Partnerships and Associations
1-50.

Defendants

Case No.1:13-cv-01417-NLH-KMW

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Return Date: July 1, 2013

**SENTARA HEALTHCARE'S
NOTICE OF MOTION TO DISMISS**

ORAL ARGUMENT REQUESTED

PLEASE TAKE NOTICE THAT Sentara Healthcare, by and through its undersigned attorneys, will move before the Honorable Noel L. Hillman, United States District Judge, on July 1, 2013, or as soon thereafter as counsel can be heard, at the United States District Court, Mitchell H. Cohen Building & United States Courthouse, 4th & Cooper Streets, Camden, NJ

08101, for an Order, pursuant to Rules 12(b)(1), 12(b)(2), and 12(b)(6) of the Federal Rules of Civil Procedure, dismissing the Plaintiff's First Amended Complaint, and for any further relief as the Court deems just and proper. The Court lacks both subject matter jurisdiction over this proceeding and personal jurisdiction over Sentara Healthcare, and Plaintiff fails to state a claim upon which relief can be granted.

PLEASE TAKE FURTHER NOTICE that as grounds for this Motion, the Court is respectfully referred to the Memorandum of Law in Support of Sentara Healthcare's Motion to Dismiss which is incorporated herein by reference, the Affidavit of Timothy S. Jennings, and the Declaration of Theodore J. Kobus III.

PLEASE TAKE FURTHER NOTICE that the motion is being made returnable on Monday, July 1, 2013 and that oral argument is requested.

PLEASE TAKE FURTHER NOTICE that a proposed form of order is submitted herewith.

Date: New York, New York
May 30, 2013

/s/ Theodore J. Kobus III
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